

The Central Utah Water Conservancy District (CUWCD) appreciated the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the I-15 Corridor Project (I-15 Project). We recognize that this project is essential to the safety of the traveling public and is vital for the continued growth and development of the State. CUWCD supports this project and recognizes the tremendous investment of time, effort, and money that will be required to see this project through to a successful completion.

We have reviewed the DEIS and appreciate the level of detail and analysis that is presented. Our concerns center mainly on the possible impacts the I-15 Project may have on water and related environmental issues we work with on a daily basis. We offer the following comments for consideration by UDOT in the hope they will be used to improve the I-15 Project and to avoid any delays or obstacles that may impact its success.

General Background

CUWCD is a political subdivision of the State of Utah. It was formally established in 1964 to act as the local entity to contract with the United States of America in connection with the construction, operation, and financing of the Center Utah Project (CUP). CUWCD consists of all of part of ten counties – Duchesne, Garfield, Juab, Piute, Salt Lake, Sanpete, Summit, Uintah, Utah and Wasatch. CUWCD is primarily a wholesaler of water to other cities and agencies, and has the responsibility to plan, design, construct, operate and maintain water facilities, administer the sale and delivery of water, and repay costs of the water projects. As part of our responsibilities, CUWCD manages reservoirs, dams, water treatment plants, Hydropower plants, diversion systems, large diameter pipelines and aqueducts, and several tunnels.

Specific Comments

A. Possible Impacts on the June Sucker: The CUWCD is a Participating Partner in the June Sucker Recovery Implementation Program (JSRIP). This multi-agency program is designed to improve and enhance the recovery of the June sucker, an endangered fish which exists naturally only in the Utah Lake Drainage. We are concerned about the impact of the I-15 Project on the Hobbie Creek restoration project that is currently underway. The goal of the Hobbie Creek Project is to enhance habitat to a level that's suitable and valuable for June sucker spawning. We encourage you to work closely with the JSRIP to coordinate efforts in this area and when crossing the Provo River, which is also important habitat for recovery of the June sucker.

B. Impact on Existing or Planned District Facilities: CUWCD owns, operates, or utilizes at least three large diameter aqueducts that maybe impacted by the I-15 Project. These aqueducts carry substantial volumes of potable water to end users. CUWCD would like to work closely with UDOT in the areas of these facilities to coordinate the construction schedule with water deliveries in an effort to ease the impact on all parties involved, including water recipients. The largest of the aqueducts is the Jordan Aqueduct. It originates near the Utah Valley Water Treatment Plant, located near the mouth of Provo Canyon, and runs north to the Jordan Valley Treatment Plant, located in Riverton. This 66-inch diameter pipeline crosses I-15 on the south side of the Point of the Mountain. The second pipeline is the 800 North Aqueduct in Orem. The portion of the 800 North Aqueduct that intersects I-15 at 800 North in Orem, is currently under design and will be installed prior to the I-15 Project. This new aqueduct will be in addition to the existing 24-inch aqueduct (historic Geneva Steel pipeline) that also crosses I-15. We are coordinating with Region 3 to make sure that the placement and design of the aqueduct will be compatible with the I-15 Project. Preliminary and final design of the new 800 North Interchange should take into consideration this new aqueduct. The final pipeline is the North Shore Aqueduct. This aqueduct is in the preliminary design phase and is planned to run from the former Geneva Steel site in Vineyard to a terminal reservoir located in Saratoga Springs. CUWCD is planning to complete installation of this aqueduct by late 2012. It is

anticipated that this aqueduct will be located within the rights-of-way of both the East-West Connector (10th South Lehi) and the Vineyard Connector. Our understanding is that both the East-West Connector and the Vineyard Connector will be constructed prior to the I-15 Project. Installation of the North Shore Aqueduct would be concurrent with the construction of these roadways. Because the proposed I-15 interchange at American Fork Main Street will possibly connect to one or both of these planned roads, it is possible that construction of the interchange may impact the operation of this proposed pipeline. CUCWD would like to coordinate with UDOT in this area in an effort to minimize impacts to the North Shore Aqueduct. CUCWD also owns three public drinking water wells with required source protection plans. The I-15 Project lies within the delineation zones for 12 additional planned future wells. CUCWD would like to work with UDOT in order to safeguard public drinking water within these protection zones through best management designs and coordination.

C. Impact on Surface Water Rights, Sources and Utah Lake: CUCWD recognizes that construction of the I-15 Project will necessitate the re-routing of historic drains, springs, and ditches. Through coordinated engineering, interrupted and diminished natural flows to Utah Lake from seeps, springs, and drains adjacent to the I-15 Project can be avoided. As operator of the CUP and owner of significant water rights in Utah Lake we are concerned about any interruption or impairment of natural flow to the lake. CUCWD owns many water rights with historic sources adjacent to the I-15 project. For example, sheet HWY-057 of the DIES shows a proposed detention basin directly on or near the location of Fugal Springs. These springs are the source of several important CUCWD owned water rights. Construction of a detention basin at this location may create a number of problems in the quantity and quality of water available from this important source. We ask that as you continue design of the I-15 Project you take into account all drains, ditches, and springs and take steps to be sure that these sources are allowed to flow unimpeded to Utah Lake as they have historically. If any of these sources need to be piped to facilitate I-15 construction, then consideration should be given to be sure that all water is collected and conveyed to Utah Lake. This is important so that CUCWD can continue to receive water right exchange credit for other water it withdraws from the groundwater basin and delivers to the public. We look forward to and appreciate the opportunity to coordinate with you as needed on these conveyance facilities.

CUCWD would like to emphasize that we support UDOT's effort to increase the safety and capacity of I-15 with the proposed project. We are anxious to assist in any way possible to help UDOT in the process. We would be pleased to discuss our concern with UDOT. We recognize that this is a project of considerable magnitude and will require coordination with a large number of agencies and communities. Thank you for your consideration of these comments. Please contact Sarah Sutherland at 801-226-7147 for any discussion of these matters.

Sincerely,
Terry J. Hickman
Environmental Programs Manager

Response to A: Throughout the environmental process, UDOT coordinated with the JSRIP regarding potential impacts to June sucker and the Hobbie Creek restoration project. A Biological Assessment was completed regarding the June sucker. The U.S. Fish and Wildlife Services' concurrence letter is included in the FEIS.

Response to B: UDOT will coordinate with CUCWD as the project progresses to accommodate design concerns regarding these aqueducts. The comment will be passed along to the Vineyard and East-West Connector teams as well.

Response to C: UDOT will work with CUCWD to maintain uninterrupted or undiminished natural flows into Utah Lake, and to avoid impacts to CUCWD's water rights.



Central Utah Water Conservancy District

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Harley M. Gillman, Vice President

Don A. Christiansen, General Manager
Secretary/Treasurer

January 11, 2008

I-15 Corridor EIS
C/O PB
488 East Winchester Street
Suite 400
Murray, UT 84107

Subject: Draft Environmental Impact Statement (DEIS), I-15 Corridor Utah County to Salt Lake County, (FHWA-UT-EIS-07-01-D); Project No. IM-NH-15-6(149)245E

Dear Sir/Madam:

The Central Utah Water Conservancy District (CUWCD) appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the I-15 Corridor Project (I-15 Project). We recognize that this project is essential to the safety of the traveling public and is vital for the continued growth and development of the State. CUWCD supports this project and recognizes the tremendous investment of time, effort, and money that will be required to see this project through to a successful completion.

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Specific Comments

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The CUWCD is a Participating Partner in the June Sucker Recovery Implementation Program (JSRIP). This multi-agency program is designed to improve and enhance the recovery of the June sucker, an endangered fish which exists naturally only in the Utah Lake Drainage.

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CUWCD would like to emphasize again that we support UDOT's effort to increase the safety and capacity of I-15 with the proposed project. We are anxious to assist in any way possible to help UDOT in the process. We would be pleased to discuss our concerns with UDOT. We recognize that this is a project of considerable magnitude and will require coordination with a large number of agencies and communities.

Thank you for your consideration of these comments. Please contact Sarah Sutherland at 801-226-7147 for any discussion of these matters.

Sincerely,

A handwritten signature in cursive script, reading "Terry J. Hickman". The signature is written in dark ink and is positioned above the printed name and title.

Terry J. Hickman
Environmental Programs Manager



United States Department of the Interior
FISH AND WILDLIFE SERVICE

UTAH FIELD OFFICE
2369 WEST ORTON CIRCLE, SUITE 50
WEST VALLEY CITY, UTAH 84119

SCANNED
6-23-08

In Reply Refer To
FWS/R6
ES/UT
08-I-0107

June 17, 2008

RECEIVED

JUN 23 2008

FHWA Utah Division

Carlos Machado
Federal Highway Administration, Utah Division
2520 W. 4700 S., Suite 9A
Salt Lake City, Utah 84118

RE: Biological Assessment for the I-15 Corridor Utah County to Salt Lake County, Utah

Dear Mr. Machado:

Based on information provided in your Biological Assessment of May 5, 2008, we concur with your "not likely to adversely affect" determination for threatened and endangered species and critical habitat. Should project plans change, or if additional information on the distribution of listed or proposed species becomes available, this determination may be reconsidered.

The U.S. Fish and Wildlife Service (Service) has reviewed your Biological Assessment for the I-15 Corridor, Utah County to Salt Lake County. The Federal Highway Administration (FHWA) and the Utah Department of Transportation (UDOT) propose to implement approximately 43 miles of highway and roadway improvements along Interstate Highway 15 (I-15) from the South Payson interchange in Utah County to the 123000 South interchange in Salt Lake County, Utah. The purpose of this Proposed Action is to relieve projected traffic congestion, improve roadway safety and traffic movement, and provide consistency with regional and local transportation and land use plans. Several elements of this project have the potential to impact the federally endangered species the June Sucker (*Catostomus, liourus*) and its habitats. These include but may not be limited to the Spanish Fork river bridges, the Hobble Creek box culvert and the Provo River Bridges.

The June Sucker Recovery Implementation Team (JSRIP) is a multi-agency effort tasked with recovering June sucker while allowing continued development in the Utah Lake drainage. The JSRIP is in the planning phases of a large-scale restoration effort on the lower Provo River and Hobble Creek. In order to recover June sucker, it is necessary to restore at least these two rivers into a more natural geomorphology that includes transitional lake-river habitat in a deltaic wetland complex.

Although implementation of the I-15 Project would have minimal impacts to the existing condition of the Provo River and critical habitat, the bridges and other related structures, features and channel changes, in their current condition preclude restoration of the river in its existing channel.

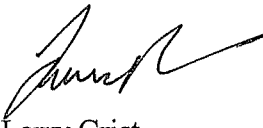
A Memorandum of Understanding (MOU) between FHWA, UDOT and the Service was signed by all parties in August 2003 stating that FHWA and UDOT would provide some level of commitment and/or contribution to the restoration of the lower Provo River and/or JSRIP which includes conservation measures and a strategy that outlines actions to recover and enhance June sucker migration and spawning habitat and to minimize impacts associated with competition and habitat modification from nonnative species. These commitments were not defined. In meetings held on May 2 and 8, 2008 with the Service, UDOT, FHWA, JSRIP- Program Directors Office, Central Utah Water Conservancy District (CUWCD) and the City of Provo it was determined that because these commitments are still unclear, an updated MOU will be necessary to specifically define necessary commitments relative to projects on the Provo River. JSRIP is currently in negotiations to acquire land north of the Provo River and if/when this happens the MOU will be constructed to include specific needs from UDOT and FHWA.

Land has recently been acquired adjacent to Hobble Creek and plans are underway to restore the river to a more natural channel including deltaic wetlands. Property east of I-15 on Hobble Creek is currently being considered for acquisition by the JSRIP to allow June sucker spawning to occur upstream. Culverts under I-15 currently preclude fish passage into these areas. In the meetings of May 2008, consensus was reached that UDOT and FHWA would explore options for fish passage and after approval by JSRIP incorporate passage structures into the construction of I-15 at Hobble Creek.

Only a Federal agency can enter into formal Endangered Species Act section 7 consultations with the Service. A Federal agency may designate a non-Federal representative to conduct informal consultation or prepare a biological assessment by giving written notice to the Service of such a designation. The ultimate responsibility for compliance with ESA section 7, however, remains with the Federal agency.

We appreciate your interest in conserving endangered species. If further assistance is needed or you have any questions, please contact Marianne Crawford, Fish and Wildlife Biologist, at (801) 975-3330 extension 134.

Sincerely,



Larry Crist
Utah Field Supervisor

cc: Merrell Jolley, Utah Department of Transportation, Region Three 658 North 1500 West, Orem, Utah.

Reed Harris, Project Directors Office, June Sucker Recovery Implementation Program, Department of Natural Resources, 1594 West North Temple, Salt Lake City, Utah, 84114-6300



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

REPLY TO
ATTENTION OF

February 14, 2008

Regulatory Division (SPK-2004-50362)

Merrell Jolley, Project Manager
Utah Department of Transportation
Region Three Headquarters
658 North 1500 West
Orem, Utah 84057

Dear Mr. Jolley:

We are responding to your request for comments regarding the December 19, 2007 *Wetland Functional Assessment Report* (Report) for the Interstate 15 (South) Corridor Project. This report includes an assessment of wetland functions for wetlands that would be impacted by the proposed Interstate 15 reconstruction. Wetland functions were assessed using Utah Department of Transportation's (UDOT's) Wetland Functional Assessment Method (WFAM). The approximately 52-mile (~3,500-acre) Interstate 15 corridor begins at the South Santaquin exit (Exit 244) in Section 1, Township 10 South, Range 1 East, 39.9755°N, 111.7725°W, and ends at the 12300 South exit (Exit 291) in Section 25, Township 3 South, Range 1 West, SLB&M, 40.5267°N, 111.8911°W in Utah and Salt Lake Counties, Utah.

We have a few comments on the subject report for the I-15 South Team to address:

1. In our review of the functional assessment, and based on our knowledge of the WFAM, we did not find any discrepancies or errors in the raw data presented in the report (i.e., the data presented in UDOT's WFAM data sheets). The Corps finds that the WFAM adequately characterizes the level of disturbance and the 10 wetland functions, and the method can be repeated by multiple practitioners trained in wetlands ecology or in similar disciplines. Additionally, the method makes assessing project-by-project mitigation requirements much more defensible from scientific and legal standpoints. We are also pleased with the WFAM, since it will be the foundation of the Utah statewide wetland functional assessment method.
2. However, the Corps is concerned that the WFAM is heavily weighted towards the wildlife functions. The Corps and other agencies (Federal Highway Administration, U.S. Fish and Wildlife Service, and Utah Division of Wildlife Resources) have been working with UDOT to develop and implement UDOT's proposed Northern Utah County Wetland Mitigation Bank (Corps project no. SPK-2007-01493). The Mitigation Banking Review Team's (MBRT's) discussions have lead to some adjustments in the calculation of Total Functional Points (Table 1) and Total Possible Points (not presented in Table 1 of the

Report). These adjustments will also change the values of the Functional Units. In our MBRT meetings, we have also determined that the Functional Category designations have no utility in developing a mitigation bank accounting and credits system. Therefore, we do not agree with, and will not utilize the Functional Points and Functional Units data presented in Table 1 of the Report. The Corps will only use the raw WFAM data provided on the data sheets in the Report for the purposes of assessing the I-15 Project mitigation requirements.

3. The MBRT has received the raw WFAM data in tabular format during UDOT's presentation of wetland impacts in the review area. The Corps would like to see these data presented in a table with the following format:

- a. Column 1 – Wetland ID
- b. Column 2 – Impacted Wetland Acreage
- c. Column 3 – Total Wetland Acreage
- d. Columns 4 through 14 – Numeric values of the functions corresponding to Questions 15a through 15k (Level of Disturbance, Plant Community Composition, etc.)

4. The WFAM is a living document, and changes and adjustments have been (and will be made in the future) to improve the quality of information generated by the method. Under the "Discussion" section of the report, we recommend that the I-15 South Team address changes and "tweaks" to the method, as well as the method's shortcomings. This information request will not result in any additional data collection for directly impacted wetlands, but it will help the Corps to better understand the mechanics of the method and how it will be implemented in future projects.

We recommend that UDOT address these comments in an addendum letter and attached table that displays the raw functional assessment data.

Please refer to identification number SPK-2004-50362 in any correspondence concerning this project. If you have any questions, please contact me at the Utah Regulatory Office, 533 West 2600 South, Suite 150, Bountiful, Utah 84010, email james.m.mcmillan@usace.army.mil, or telephone 801-295-8380, extension 17.

Sincerely,

/s/

James McMillan
Senior Regulatory Project Manager

Copies furnished:

Carlos Machado, Federal Highway Administration, Utah Division, 2520 West 4700 South, Suite 9A, Salt Lake City, Utah 84118

Robin Coursen, U.S. Environmental Protection Agency, Region 8, 1595 Wynkoop Street, Denver, Colorado 80202-1129

Betsy Herrmann, U.S. Fish and Wildlife Service, Utah Field Office, 2369 West Orton Circle, Suite 50, West Valley City, Utah 84119

Ron Clegg, PB Americas, Incorporated, 488 East Winchester Street, Suite 400, Murray, Utah 84107

Todd Sherman, Wetland Resources, 182 East 300 North, Logan, Utah 84321